



**NCUA**  
National Credit Union Administration

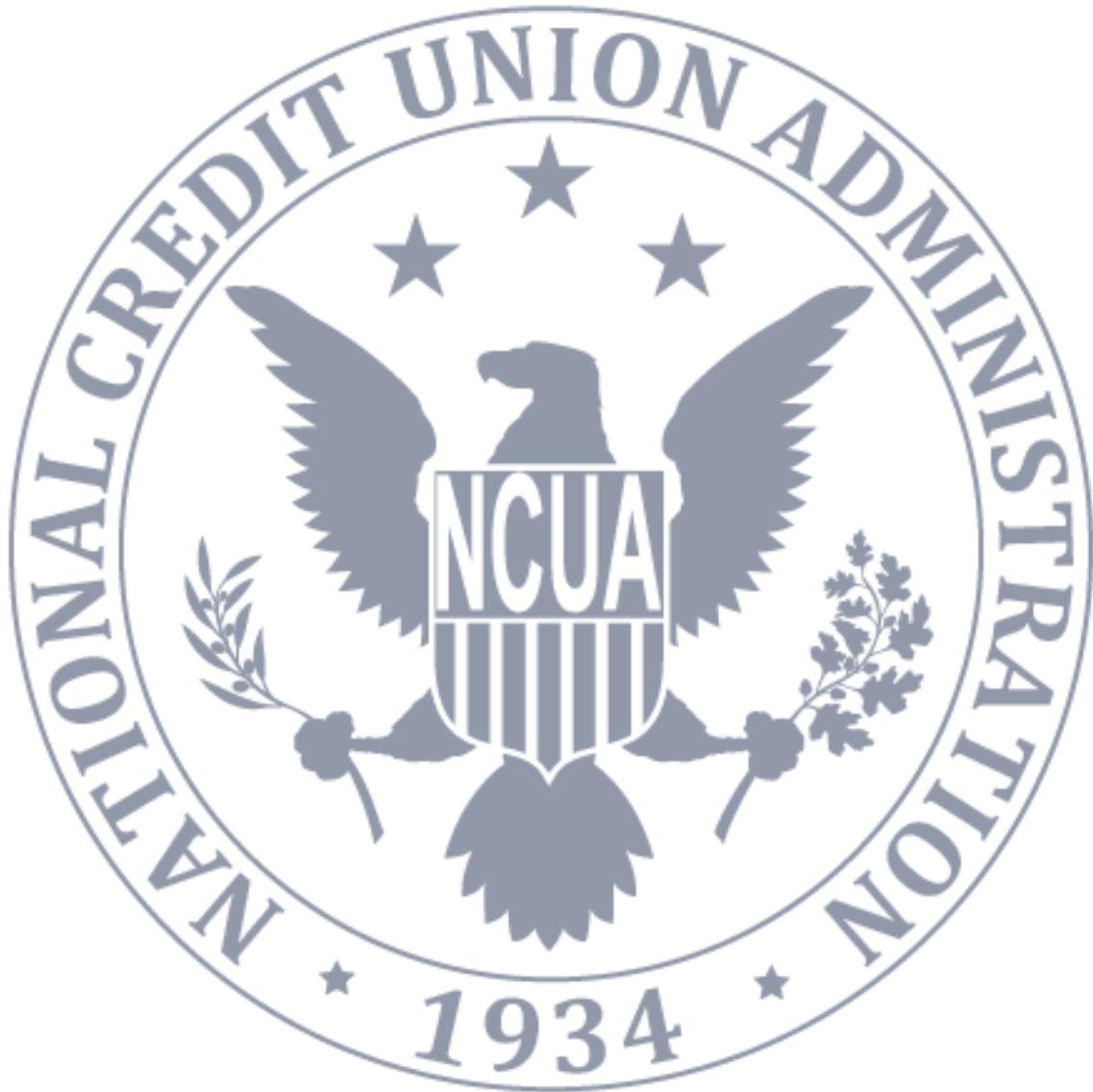
# OFFICE OF MINORITY AND WOMEN INCLUSION 2018 ANNUAL REPORT TO CONGRESS

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March 2019



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## OMWI Report to Congress • 2018

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### Table of Contents

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Message from the Director .....	3
Introduction .....	4
• National Credit Union Administration .....	4
• Office of Minority and Women Inclusion .....	4
Workforce Diversity and Inclusion .....	5
• Demographics of Current Agency Workforce .....	5
• Accomplishments .....	12
• Opportunities and Next Steps .....	19
Supplier Diversity .....	21
• Contracting Metrics .....	21
• Outreach .....	23
• Partnerships .....	24
• Accomplishments .....	25
• Opportunities and Next Steps .....	26
• Asset Management and Assistance Center .....	27
Regulated Entities .....	31
• Current State .....	31
• Assessing Diversity Policies and Practices .....	32
• Education and Outreach .....	35
• Opportunities and Next Steps .....	36
Appendices .....	37
I. NCUA Workforce Diversity Data .....	37
II. 2018 Federal Employee Viewpoint Survey Inclusion Index Scores ...	38
III. 2018 Policy Statement on Diversity and Inclusion .....	39
IV. 2018 Policy Statement on Equal Employment Opportunity .....	40
V. NCUA Supplier Diversity Data .....	41
VI. 2018 Credit Union Diversity Self-Assessment Results .....	42



## Message from the Director

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I am pleased to present this annual report to Congress from the Office of Minority and Women Inclusion. This report is a comprehensive summary of progress the NCUA has made toward its long-term goals. It also captures plans and opportunities to meet the challenges that remain.

Through the leadership of NCUA Chairman J. Mark McWatters and Board Member Rick Metsger, the NCUA is committed to having a diverse workforce and an inclusive workplace with diversity and inclusion built into all agency operations. This report reflects that commitment and demonstrates the dedication the NCUA's leadership puts forth to ensure these goals are not just aspirational, but also achievable.

Over the past year, the NCUA achieved some of the most significant accomplishments in diversity and inclusion since the establishment of the Office of Minority and Women Inclusion in 2011. A few of these highlights are:

- The NCUA awarded 45 percent of reportable contract dollars to minority- and women-owned businesses, reaching the highest supplier diversity levels in the agency's history.
- Diversity increased at all levels throughout the NCUA's workforce. The most significant change was a 1.7 percentage point increase in racial and ethnic diversity across the entire workforce and a 2.2 percentage point increase in women among the Senior Staff Personnel.
- Eighty-one credit unions submitted Voluntary Credit Union Diversity Self-Assessments, a 26 percent increase over submissions in 2017.
- The first three employee resource groups (ERGs) representing the Hispanic, African American, and LGBTQ communities at the NCUA were established. The NCUA's newly launched ERG program will cultivate a more inclusive environment in the agency.

With much gratitude to the leaders, managers, and employees who contributed to the NCUA's success in diversity and inclusion, and to all those giving unwavering support to the Office of Minority and Women Inclusion, I proudly look forward to another year of progress and great accomplishments.

  
Director  
Office of Minority and Women Inclusion



## Introduction

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The NCUA's Office of Minority and Women Inclusion (OMWI) is pleased to present this annual report to Congress in accordance with Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The report includes an overview of the agency's efforts to:

- Increase workforce diversity and build a more inclusive environment within our workplaces;
- Ensure fair and inclusive business practices in procurement, contracting, and other business activities; and
- Assess the diversity policies and practices of entities regulated by the NCUA.

## National Credit Union Administration

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The NCUA is an independent federal agency created by the U.S. Congress to regulate, charter, and supervise federal credit unions and insure the majority of deposits in both federal and state chartered credit unions. The agency's mission is to provide, through regulation and supervision, a safe and sound credit union system which promotes confidence in the national system of cooperative credit.

## Office of Minority and Women Inclusion

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The NCUA's Office of Minority and Women Inclusion is responsible for measuring, monitoring, and establishing policies for diversity and inclusion in the agency's management, employment, and business activities. The office is also responsible for assessing the diversity in the NCUA's regulated entities. In addition, the office manages the agency's equal employment opportunity programs.

The NCUA's Office of Minority and Women Inclusion reports directly to the NCUA's Board Chairman.

### Office of Minority and Women Inclusion

#### VISION

An inclusive culture where differences are leveraged to ensure a safe and sound credit union system.

#### MISSION

The Office of Minority and Women Inclusion promotes diversity within the NCUA and the credit union system and ensures equal opportunity in the NCUA's employment and business activities.

#### VALUES

- Respect differences
- Intentionally include
- Realize the power of people
- Embrace change
- Drive innovation



## Workforce Diversity and Inclusion

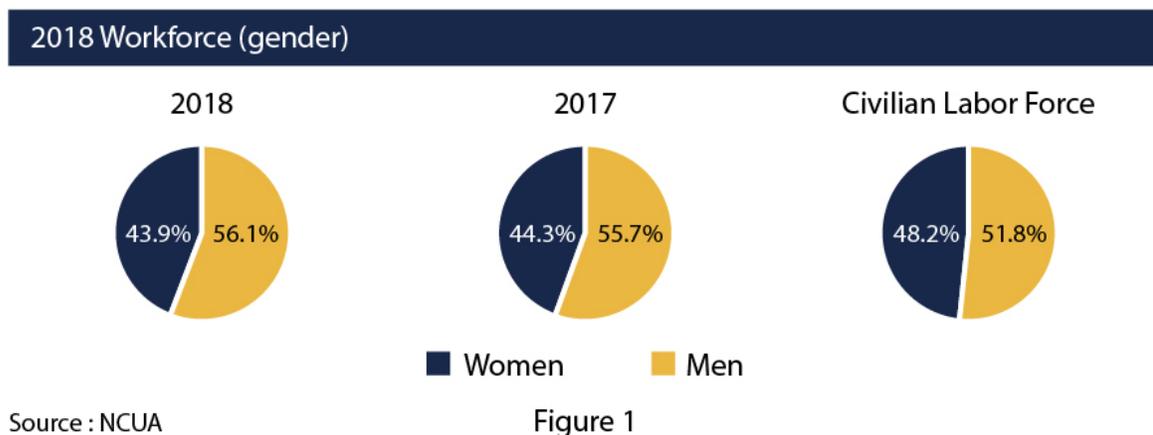
### Demographics of Current Agency Workforce

The NCUA benchmarks its workforce composition against the national Civilian Labor Force as defined by the Equal Employment Opportunity Commission. The national Civilian Labor Force uses the most recently available U.S. Census data, which is currently from 2010. It reflects people 16 years of age and older, employed, or actively seeking employment, but not serving in the military or institutionalized. The agency also uses Occupational Civilian Labor Force data for benchmarking. The Occupational Civilian Labor Force is based on census data that is comparable to the occupational population of financial examiners, which is the largest portion of the NCUA’s workforce.

#### NCUA Workforce

The NCUA’s workforce consisted of 1,113 employees<sup>1</sup> onboard as of December 31, 2018. The number of employees onboard in 2018 represents a 2.3 percent reduction compared to the same time last year.

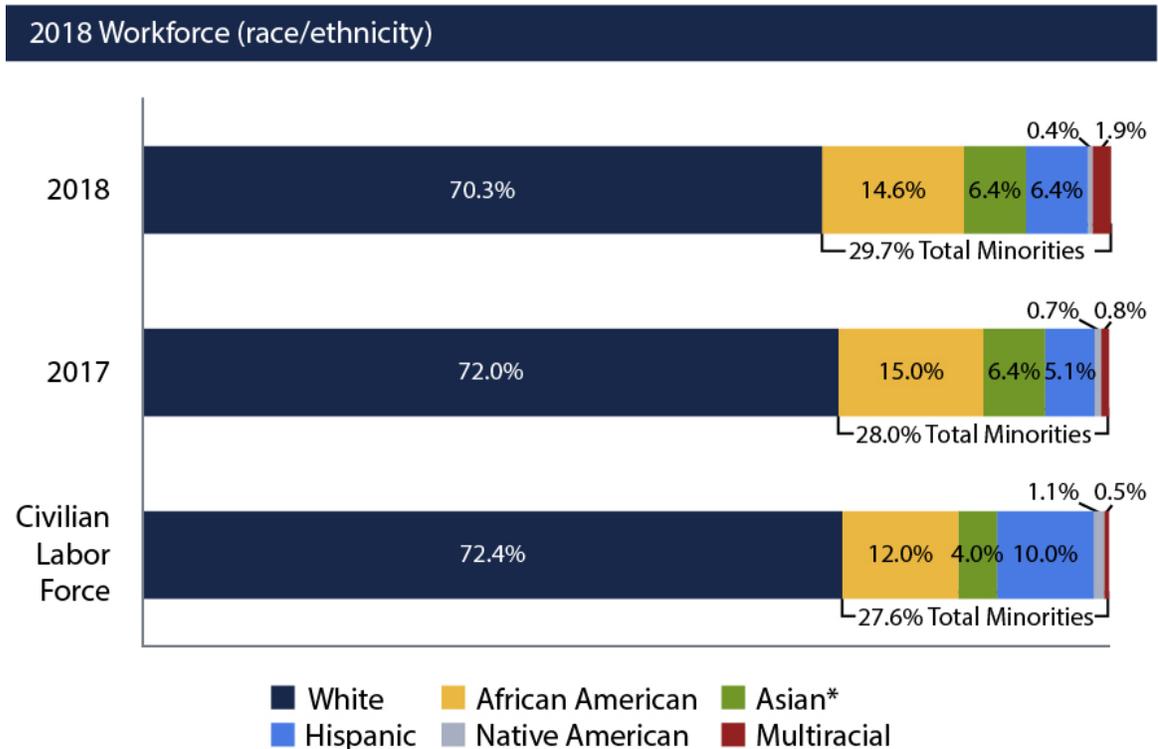
**Gender:** As shown in **Figure 1**, the NCUA’s workforce is 43.9 percent women. This participation rate is slightly less than the previous year’s onboard percentage of 44.3 percent. This is a negative trend when compared to the EEOC’s Civilian Labor Force benchmark of 48.2 percent.



<sup>1</sup> Whereas the 2018 NCUA Annual Report stated an NCUA employee total figure of 1,107, said figure was based on the number of full time equivalents as of 12/22/2018 (NCUA’s last pay period for the year). The total workforce figure in this report of 1,113 represents the number of onboard NCUA staff as of 12/31/2018.



**Race and Ethnicity:** Minority representation increased 1.7 percentage points in 2018. The NCUA exceeds the Civilian Labor Force in the African American, Asian, and Multiracial groups. Although the NCUA’s Hispanic population experienced an increase of 1.3 percentage points, this group continues to be the agency’s most underrepresented group. Other groups in the agency showing a less than expected participation rate when compared to the Civilian Labor Force are American Indians or Alaska Natives and Native Hawaiians or Other Pacific Islanders. Different from last year’s reporting, Whites now show a less than expected onboard percentage. Notably, this group experienced the largest number of retirements.



\*Asian includes Native Hawaiian or Other Pacific Islander

Source : NCUA

Figure 2

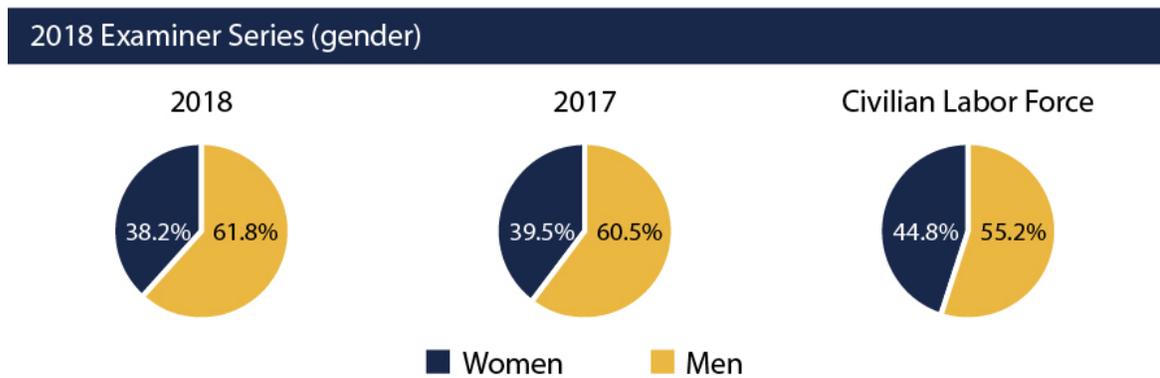
## Major Occupation

The credit union examiner series is the major occupation at the NCUA and accounts for 67.8 percent of the agency’s workforce. This represents a reduction of 3.2 percent from last year’s reported 71.0 percent. The reduction was attributed to a combination of last year’s retirements and the agency’s reorganization of headquarters and consolidation of its regional offices in 2017 and 2018.



**Figure 3**, below, and **Figure 4**, on page 8, compare the percentages of employees in the credit union examiner series based on gender and race or ethnicity, respectively, for years 2017 and 2018, and the Occupational Civilian Labor Force.

**Gender:** Gender representation among examiners did not change much from 2017 to 2018. Of significant note is the examiner workforce, which has more men and fewer women by 5.7 percentage points compared to the overall NCUA workforce. Comparing the credit union examiner workforce to the Occupational Civilian Labor Force reveals an even greater gap, with the NCUA having more males and fewer females than the labor force by 6.6 percentage points.



Source : NCUA

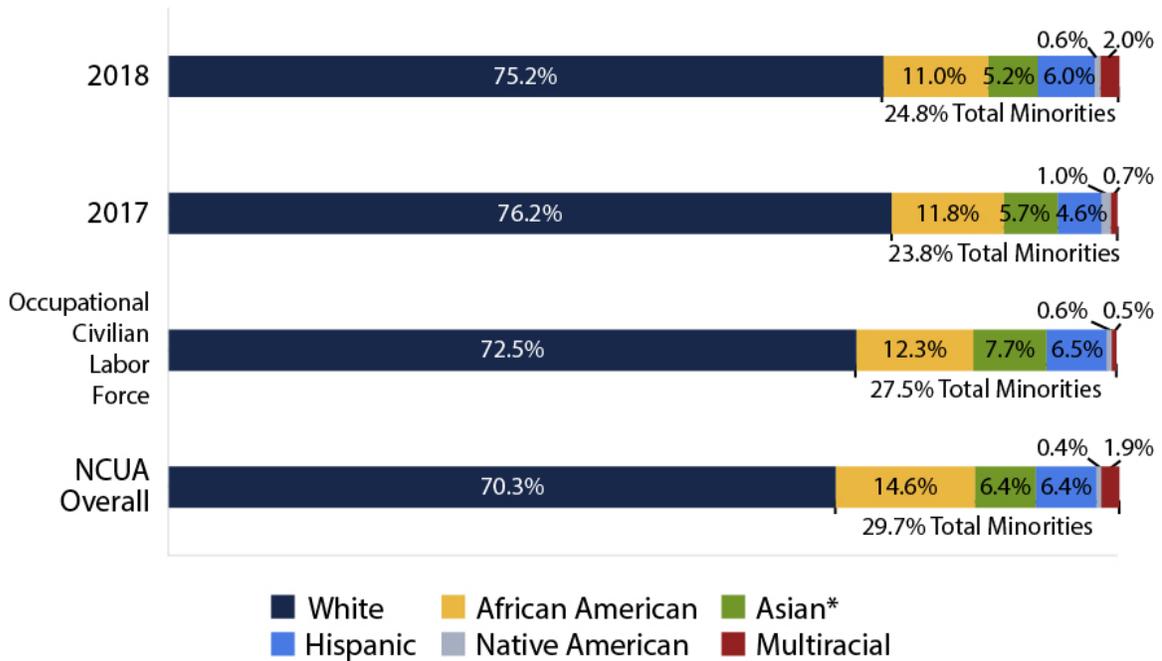
Figure 3

**Race and Ethnicity:** While being consistent with the job series benchmarks, the minority population among credit union examiners is 4.9 percentage points lower than the total NCUA minority population. In the majority of the groups, the percentage of employees in the examiner series is less than one percentage point above or below the same group of employees in the overall workforce. The percentage of Asians in the examiner series is 1.2 points lower than in the overall workforce, while the largest difference is in the African American group, which is 3.7 percentage points lower in the examiner job series than in the total NCUA workforce.

The percentage of minorities in this job series closely reflects the expected rates among the Occupational Civilian Labor Force. The largest differences occur in the Asian group, which has a lower than expected participation by 2.5 percentage points, and in the Multiracial group which has a higher than expected rate of participation by 1.5 percentage points.



## 2018 Examiner Series (race/ethnicity)



\*Asian includes Native Hawaiian or Other Pacific Islander  
 Source : NCUA

Figure 4

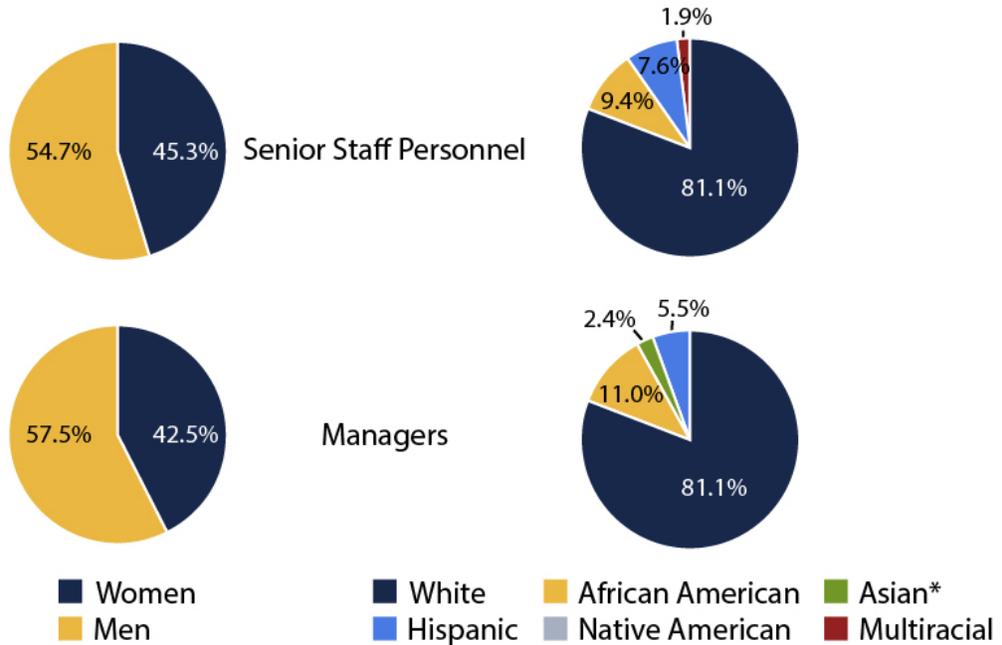
### Executives and Managers

The representation of minorities and women in senior staff positions increased in 2018. Executives, excluding NCUA Board Members, are employees in positions identified as senior staff positions. These individuals accounted for 4.8 percent of the workforce, slightly up from 4.5 percent in 2017. Women represented 45.3 percent of all senior staff in 2018, which is up from 43.1 percent in 2017. Additionally, minority individuals hold 18.9 percent of the senior staff positions, which is also up from 15.7 percent in 2017.

Managers include all supervisory staff who are not executives and accounted for 11.4 percent of the NCUA workforce in 2018. Women represented 42.6 percent of all managers, which is slightly less than the 42.7 percent reported in 2017. Minorities represented 18.9 percent of all managers, which is an increase of 2 percentage points over 2017.



## 2018 Executives and Managers (gender, race, and ethnicity)



\*Asian includes Native Hawaiian or Other Pacific Islander  
 Source : NCUA

Figure 5

### Workforce Pipeline Distribution

The NCUA reviews the diversity of the agency’s pipeline in three grade range categories: CU-12 and below, CU-13 to CU-15, and senior staff (see **Figure 6**, page 10). The overall minority population at each of the three pipeline grade levels for 2018 is higher than the total minority levels in 2017. Notable increases include Hispanics in the Senior Staff and in CU-12 and below positions, and women in Senior Staff Personnel positions.



NCUA Workforce Pipeline Diversity										
CU-12 & below	2018 number	2018 percent	2017 number	2017 percent	2016 number	2016 percent	2015 number	2015 percent	2014 number	2014 percent
Women	233	43.6%	252	45%	279	45.2%	289	44.3%	302	44.7%
African American	95	17.8%	102	18.2%	115	18.6%	120	18.4%	121	17.9%
Asian*	37	6.9%	40	7.1%	41	6.6%	42	6.4%	40	5.9%
Hispanic	37	6.9%	28	5%	30	4.9%	31	4.7%	29	4.3%
Native American	2	0.4%	3	0.5%	5	0.8%	9	1.4%	7	1%
Multiracial	13	2.4%	8	1.4%	7	1.1%	6	0.9%	7	1%
Total Minorities	184	34.5%	181	32.3%	198	32.1%	208	31.9%	204	30.2%
CU-13 to CU-15	2018 number	2018 percent	2017 number	2017 percent	2016 number	2016 percent	2015 number	2015 percent	2014 number	2014 percent
Women	232	44.3%	231	43.9%	230	43.3%	220	43.1%	222	44%
African American	63	12%	64	12.2%	60	11.3%	56	11%	57	11.3%
Asian*	34	6.5%	32	6.1%	34	6.4%	30	5.9%	31	6.2%
Hispanic	30	5.7%	28	5.3%	23	4.3%	23	4.5%	23	4.6%
Native American	3	0.6%	5	1%	5	0.9%	3	0.6%	3	0.6%
Multiracial	7	1.3%	1	0.2%	1	0.2%	1	0.2%	1	0.2%
Total Minorities	137	26.2%	130	24.7%	123	23.3%	113	22.1%	115	22.8%
Senior Staff	2018 number	2018 percent	2017 number	2017 percent	2016 number	2016 percent	2015 number	2015 percent	2014 number	2014 percent
Women	24	45.3%	22	43.1%	21	42.9%	22	41.5%	21	41.2%
African American	5	9.4%	5	9.8%	5	10.2%	4	7.5%	3	5.9%
Asian*	0	0%	1	2%	1	2%	2	3.8%	2	3.9%
Hispanic	4	7.6%	2	3.9%	1	2%	1	1.9%	1	2%
Native American	0	0%	0	0%	0	0%	0	0%	0	0%
Multiracial	1	1.9%	0	0%	0	0%	0	0%	0	0%
Total Minorities	10	18.9%	8	15.7%	7	14.3%	7	13.2%	6	11.8%

\* Asian includes Native Hawaiian or Other Pacific Islander.

Figure 6

## New Hires and Separations

During the 2018 calendar year, the NCUA hired 83 new staff members, which is significantly greater than the previous year's 33 reported new hires. Of the new employees that came on board, 48.2 percent were women and 39.8 percent were minorities. While this represents a decrease from 51.5 percent and 45.5 percent, respectively, in 2017, the percentages of women and minorities onboarded are higher than the NCUA's current demographic makeup.



Retirements and voluntary separations accounted for 81.4 percent of total separations. Those who left for employment elsewhere accounted for 14.2 percent of total separations while 4.4 percent involuntarily separated. There were thirteen more separations in 2018 than reported in 2017. Women made up 51.3 percent of the total separations, which is an increase of 4.2 percent compared to the previous year. Minorities made up 28.3 percent of all separations, which is also an increase from the previous year’s 26.5 percent. Demographics of new hires and separations by race and gender are available in **Figure 7**.

2018 New Hires and Separations				
Demographic Group	New Hire number	New Hire percent	Separation number	Separation percent
Women	40	48.2%	58	51.3%
Men	43	51.8%	55	48.7%
White	50	60.2%	81	71.7%
African American	15	18.1%	17	15%
Asian*	9	10.8%	7	6.2%
Hispanic	8	9.7%	6	5.3%
Native American	0	0%	1	0.9%
Multiracial	1	1.2%	1	0.9%
Overall Total	83	100%	113	100%
Total Minorities	33	39.8%	32	28.3%

\* Asian includes Native Hawaiian or Other Pacific Islander.

Figure 7

## Individuals with Disabilities

The NCUA exceeded the federal goals for employees with disabilities and for employees with targeted disabilities. The percentage of employees with disabilities exceeded the 2018 federal goal by less than one percentage point, while the percentage of employees with targeted disabilities exceeded the federal goal by 1.1 percentage points. See **Figure 8** on page 12 for details.



Employees with disabilities												
	Federal Goal as of 2018	Federal Goal through 2017	2018 number	2018 percent	2017 number	2017 percent	2016 number	2016 percent	2015 number	2015 percent	2014 number	2014 percent
Employees with Disabilities	12%	10%	142	12.8%	160	14%	111	9.3%	119	9.8%	114	9.2%
Employees with Targeted Disabilities	2%	2%	34	3.1%	39	3.4%	11	0.9%	12	1%	11	0.9%

Figure 8

## Accomplishments

For the NCUA, 2018 was a year of significant internal transition due to an ongoing organizational realignment. During this time, the NCUA made progress toward greater diversity in its workforce and increased inclusiveness within its workplaces. Highlights of these efforts include the following programs, initiatives, and activities:

### Leadership Development

Twenty-six employees participated in NCUA-led or sponsored leadership development programs in 2018. The programs provide employees with training and growth opportunities. As illustrated in **Figure 9**, on page 13, employees in these programs represented many diverse groups. Eight participants, or 31 percent, were from minority groups. Twelve, or 46 percent, were women. Overall, gender, racial, and ethnic representation aligns with 2018 agency-wide workforce representation.



Leadership Development Programs								
Program	Number	Women	Men	White	African American	Asian	Hispanic	Multiracial
Aspiring Leader	1	1	0	0	0	0	1	0
Excellence in Government	0	0	0	0	0	0	0	0
Executive Coaching	9	5	4	7	1	0	0	1
Executive Leadership	4	1	3	2	2	0	0	0
Management Development	8	1	7	6	1	0	0	1
NCUA Executive Training	3	3	0	3	0	0	0	0
New Leader	1	1	0	0	1	0	0	0
<b>Total</b>	<b>26</b>	<b>12</b>	<b>14</b>	<b>18</b>	<b>15</b>	<b>0</b>	<b>1</b>	<b>2</b>

Figure 9

**Mentoring Program:** The NCUA created its mentor program in 2016 to provide developmental opportunities, build cross-cultural understanding, and cultivate greater inclusion of all employees. The year-long program served 18 mentoring pairs in its second full year. In May 2018, the program launched its third year with a class of 26 mentoring pairs.

## Recruitment and Outreach

The NCUA continues to conduct recruitment and outreach to increase awareness of potential employment opportunities among diverse pools of talent. The majority of these outreach and recruitment efforts target groups with less-than-expected participation in the workforce (per Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) and individuals with disabilities (per Executive Order 13548).

To attract diverse and highly talented applicants who qualify specifically for the credit union examiner series (0580) — the agency’s main occupational category — the NCUA participated in national recruitment events sponsored by the National Black MBA Association and Prospanica.

**Internship Program:** Since 2010, the Office of Minority and Women Inclusion has provided college students with opportunities to gain career experience while completing their undergraduate and graduate studies. In 2018, the agency hosted 15 interns selected from organizations that serve groups historically underrepresented in the federal government. These organizations include:



- Hispanic Access Foundation;
- Hispanic Association of Colleges and Universities;
- INROADS;
- Minority Access;
- The Washington Center; and
- Thurgood Marshall College Fund.

Students participating in the program represented colleges and universities from seven states, Puerto Rico and the District of Columbia. The agency extended a number of internships well beyond the initial summer timeframe, providing additional experience for student participants.

**Alternative Recruitment Tools:** The NCUA uses a number of alternative tools to expand the NCUA's reach to diverse pools of talent. These include:

- Subscribing to DiversityJobs.com, which gives the agency access to the largest Hispanic and Latino talent database in America with over 250,000 active members and unlimited job postings;
- Using LinkedIn Recruiter, which helps the NCUA narrow search criteria to targeted groups, track candidates based on previous user history, and increase applicant engagement;
- Using USAJobs resume mining tool to search for applicants associated with diverse organizations;
- Maintaining a database of applicants who apply for positions using the Schedule A hiring authority;
- Distributing vacancy announcements through mass marketing software to more than 550 organizations, many of which have specific, targeted audiences, like:
  - AllBilingualJobs.com,
  - AllHispanicJobs.com,
  - LatinoJobs.org, and
  - LatPro.com; and
- Placing general recruitment advertisements and articles featuring the NCUA in publications with diverse audiences, such as:
  - *Black EOE Journal*,
  - *DIVERSEability Magazine*,
  - *Hispanic Network Magazine*,
  - *Professional Woman's Magazine*, and
  - *U.S. Veterans Magazine*.



## Inclusive Work Environment

The NCUA is committed to creating an inclusive work environment, as stated in the agency's [2018–2022 Strategic Plan](#):

**GOAL 3.1: ATTRACT, ENGAGE, AND RETAIN A HIGHLY SKILLED, DIVERSE WORKFORCE AND CULTIVATE AN INCLUSIVE WORK ENVIRONMENT.**

Inclusion is measured using the Office of Personnel Management's Inclusion Index, which is a score calculated from a subset of questions from the Federal Employee Viewpoint Survey. In 2018, the NCUA's overall index score was 63 while the government-wide score was 61. The NCUA scored higher than the government average on 80 percent of the questions and scored particularly high in the fair, open, and supportive categories included in the index. Appendix II, found on page 38, provides the list of questions and scores for each.

**Employee Resource Groups:** The NCUA established a new employee resource group program in December 2017. In 2018, the agency launched three new groups, which will contribute to creating a more inclusive work environment for employees. The new groups established charters, recruited members and leadership, selected executive sponsors, and set goals for the group's work. In addition to these three approved groups, two additional groups are in the formative stage and will launch in early 2019. The NCUA's three employee resource groups include:

- **CULTURA (Creating Unity, Learning to Understand, Recognizing All):** This group's name is also their mission. They are working to develop and retain Hispanic and Latino talent and build greater cultural awareness among the NCUA's workforce.
- **NCUA Pride (People Recognizing Individual Differences Equally):** NCUA PRIDE's mission is to promote and support an accepting environment, and provide assistance to achieve and celebrate full inclusion of all employees; and promote understanding and awareness of the benefits diversity brings to build and sustain a strong and thriving workforce.
- **UMOJA (Unity):** Recognizing a common African ancestry, UMOJA embraces the principle of unity through connectivity and community by intentionally including all employees desiring to increase awareness and respect for differences, pursue opportunities for innovation and change, and align with others to build and sustain a thriving workforce.



**Special Emphasis Programs:** The NCUA’s Special Emphasis Program is a significant component of efforts to build inclusion and understanding within the agency’s workplaces. For each of the eight programs, the OMWI office hosts an event featuring guest speakers who provide a range of experience and insight into how to be more intentionally inclusive of each special population. These events are very well attended, both in person and virtually. The following list includes details of each event:

Special Emphasis Program Events		
Special Emphasis Observance	Event	Speaker
National African American History Month	Engaging in Bold, Inclusive Conversations	Mary-Francis Winters, diversity expert
National Women’s History Month	GenderSpeak Workshop	Tammy Hughes, gender communication expert
National Asian/Pacific Islander Heritage Month	Myth of the Model Minority: Asian Americans Facing Racism	Rosalind Chou, sociology professor and author
LGBT Pride Month	Finding Similarities in Our Differences	Ryan Sallans, transgender speaker and author
National Hispanic Heritage Month	The Growing Impact of the Latino Community in the United States	Dr. Robert Rodriguez, diversity expert
National Disability Employment Awareness Month	America’s Workforce: Empowering All	Billy W. Wright, federal employee
National American Indian/ Alaska Native Heritage Month	A Tribute to Virginia Indians	Frances Broaddus Crutchfield, Native American advocate and author
Veterans Day	Diversity and Inclusion the Submarine Way	John Vincent Gregory, diversity expert and author

Figure 10

**OMWI Talks:** Each month, the Office of Minority and Women Inclusion hosts a semi-facilitated open discussion for NCUA employees. These OMWI Talks aim to create a safe space for employees to discuss sensitive diversity and inclusion related topics. By having conversations about our differences, we can broaden our awareness and understanding of others, leverage our diversity, and foster greater inclusion. These discussions give employees opportunities to analyze and discuss complex topics and learn how to manage challenges that may affect the workplace environment.

The office hosts the OMWI Talks in the Central Office and posts resources for hosting local OMWI Talks for field employees. In 2018, field employees had the opportunity to experience OMWI Talks during an agency-wide training event in May 2018. These were extremely well attended and significantly increased the reach of this program.

During 2018, the OMWI Talks featured the following topics:

- Age (January, November);
- Race (February, May);



- Sexual Harassment (March);
- Inclusion (April, May);
- Gender (May);
- Culture (July, October);
- Allies (September); and
- Appearance (December).

**Reorganization Transition Liaison Program:** Due to a major reorganization of the NCUA, a large number of employee reassignments and relocations occurred in 2018. To ease the transition and help ensure the full inclusion of reassigned staff into their new offices and regions, the Office of Minority and Women Inclusion established the Reorganization Transition Liaison Program. This program matched reassigned staff members with a liaison from their new team. The liaisons served as points-of-contact to answer questions and provide transitioning staff with insight on things like operating procedures, culture of the new office or region, and geographic information the reassigned employee needed upon relocating to their new home. This program built on the agency's inclusiveness to ensure the effective implementation of the reorganization.

**Diversity Advisory Council:** The council is a sub-committee of the agency's Talent Management Council. The council met on a quarterly basis to provide advice and recommendations to senior leadership on areas related to the fair inclusion of all groups in the agency's workforce. The council was also instrumental in drafting the diversity and inclusion strategic plan and in consulting on new initiatives.

## Awareness and Education

**VIBE:** VIBE is an initiative launched in early 2018. The goal of this ongoing campaign is to improve the agency's culture by making a conscious, deliberate effort to adopt inclusive behaviors and habits. We seek to achieve this goal by focusing on a few specific behaviors that help create a greater sense of belonging among the agency's employees. These four behaviors are:

- **V**alue Differences
- **I**ntentionally Include
- **B**reak Biases
- **E**mbrace Change



This initiative includes components that educate the NCUA staff, build cross-cultural awareness, influence positive perceptions and understanding, and lead to inclusive habits. In 2018, this campaign included multiple events to engage employees in learning about inclusive behaviors. During the VIBE launch event, employees learned about the four



behaviors through interactive activities and demonstrations. In December 2018, a “VIBE Celebrates” event featured diverse NCUA employees sharing their customs and traditions for some of the various national, regional, cultural, secular, and religious observances they celebrate. Each month, the campaign also highlighted some of the ways employees and offices “VIBE” in their work by putting inclusive behaviors into practice.

**Policy Statements:** Chairman McWatters issued new policy statements to all NCUA employees confirming his commitment to equal employment opportunity and to diversity and inclusion. These statements are included as appendices III and IV to this report on pages 39 and 40.

**Training:** OMWI continued a multi-year effort to provide face-to-face training opportunities in small settings. The goal of these trainings is to improve employee knowledge and understanding of the value of diversity and inclusion as it relates to that group or office’s specific work and area of responsibility.

In 2018, the office conducted trainings for the following groups:

- All supervisors in various regional field offices,
- New managers in the agency’s New Supervisor Orientation program,
- All employees within the agency’s Office of Consumer Financial Protection,
- Examiners in attendance at the agency’s Exam Issues Forum, and
- Examiners at multi-group meetings.

These trainings were tailored to provide the respective audiences with relevant information and practices to their specific roles and responsibilities.

Additionally, diversity and inclusion training was added to all employees’ learning plans through the NCUA’s online learning management system. The three modules included in the training were Promoting Diversity and Avoiding Discrimination, Unconscious Bias, and Understanding Workplace Diversity. The agency achieved a completion rate of 97.2 percent for the online training.

**Diversity and Inclusion Award:** The agency granted this new award to recognize an NCUA employee who exhibited an outstanding commitment to diversity and inclusion. The Diversity and Inclusion Award honors individuals or groups who have demonstrated respect and value for differing backgrounds and points of view within the NCUA and the credit union system, and for supporting, leading, or enhancing the NCUA’s diversity and inclusion efforts. The agency created this award in 2017 and presented it for the first time in 2018.



## **Opportunities and Next Steps**

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In addition to the continuation of ongoing programs and education, some new initiatives that will launch during 2019 include:

### **Leaders Lead in Diversity & Inclusion 2019**

To support our leaders in developing greater competency in the principles of diversity and inclusion, OMWI created the Leaders Lead in D&I 2019 campaign. This will provide leaders with opportunities to play a larger role in ongoing OMWI initiatives. Such opportunities include:

- Hosting one of our monthly OMWI Talks;
- Sponsoring an employee resource group; and
- Participating in a VIBE Leadership Panel to discuss how they demonstrate one of the four inclusive VIBE behaviors.

We will also provide a leadership toolkit and additional training to help our leaders create and support a more inclusive workplace.

### **Employee Engagement**

The recently issued *2018–2019 Human Capital Plan* provides several strategies to improve organizational effectiveness and enhance employee engagement. One of those strategies requires each NCUA office to develop a Workforce Engagement Action Plan based on the Employee Engagement Index score from the Federal Employee Viewpoint Survey for 2018. The goal is to improve the Employee Engagement Index by at least two percentage points in 2019. To support this effort, the Office of Human Resources published a *Workforce Engagement Action Plan Handbook* including strategic direction, guidance on successful team engagement, resources and more.

### **Diversity and Inclusion Dashboard**

OMWI will begin issuing a quarterly diversity and inclusion dashboard to measure the effectiveness of the agency's diversity and inclusion efforts. The dashboard will track workforce demographics, workplace inclusion through OPM's Inclusion Index, supplier diversity, and reasonable accommodation activity.

### **Diversity and Inclusion Performance Element Guidance**

In 2019, the NCUA will remind all managers on how they can meet and exceed the required performance level within the diversity and inclusion element of their annual performance plans.



## Relaunch of the Diversity Advisory Council

In 2019, the NCUA will solicit new members and relaunch the Diversity Advisory Council. The new roles of the council members will be to:

- Recommend strategies to promote diversity and inclusion within the agency to capitalize on the increasing diverse population and enhance the agency's human capital investment;
- Make recommendations to the Talent Management Council to address barriers for equal opportunity and to cultivate inclusion;
- Serve as liaisons within regional and headquarters offices to OMWI; and
- Provide regional and central office staff with information and guidance on OMWI services related to equal employment opportunity, reasonable accommodations, diversity, and inclusion.

The Diversity Advisory Council will include representatives of employees at all levels (e.g., executives, supervisors, and non-supervisors from multiple grade levels) and a diverse spectrum of functional areas (e.g., field program, legal, human resources, technology, and others). In addition, members will be comprised of a cross-section of the agency's staff representing different types of diversity (e.g., race, ethnicity, gender, age, sexual orientation, disability, veteran status, experience, and others). A union representative will also be included. Upon selection, members will receive extensive diversity and inclusion training and complete a comprehensive orientation program.



## Supplier Diversity

Following four years of continuous progress in supplier diversity, 2018 represents yet another record year of success in the NCUA’s supplier diversity performance. By year-end, the agency awarded 45 percent of its reportable contract dollars to minority- and women-owned businesses.<sup>1</sup> This represents a notable achievement and an increase from 39 percent in 2017. The agency’s performance in 2018 demonstrates the positive impact of intentional and consistent inclusion of proven, qualified, and responsive minority- and women-owned businesses in the NCUA’s competitive procurement process. The result is an effective business strategy that delivers the best value to the agency.

## Contracting Metrics

In 2018, the NCUA awarded \$29.3 million to minority- and women-owned businesses. This represents 45.0 percent of the \$65.0 million total reportable contracting dollars for the year. **Figure 11** illustrates total dollars awarded to diverse vendors in 2018 compared to 2017. Contract dollars to all firms designated as minority-owned nearly doubled from \$8.0 million in 2017 to \$15.6 million in 2018. Most of this gain was attributable to contracts supporting the agency’s substantial investments in modernizing its information technology systems. Additionally, a competitive contract awarded to a minority-owned firm for the management of the agency’s Central Office building in Alexandria, Virginia, boosted the participation of that group as a percentage of total agency contracts.

NCUA Contract Awards Comparison For 2018 Versus 2017				
Contract Awards	2018	Percent of Total Contracts	2017	Percent of Total Contracts
Minority-owned businesses	\$12,024,076	18.5%	\$5,129,053	11.6%
Women-owned businesses	\$13,711,281	21.1%	\$9,198,616	20.9%
Both minority- and women-owned businesses	\$3,536,751	5.4%	\$2,870,940	6.5%
<b>Total contract awards</b>	<b>\$65,049,098</b>		<b>\$44,114,626</b>	
<b>Total minority-owned or women-owned business</b>	<b>\$29,272,108</b>	<b>45.0%</b>	<b>\$17,198,609</b>	<b>39.0%</b>

Figure 11

<sup>1</sup> “Reportable contract dollars” refers to contract award dollars obligated during 2018. It excludes office leases, payments associated with real property (e.g., owner association fees, parking), hotel, and other space rental expenses, utilities, taxes, and government payments.



Similarly, contract dollars to all firms designated as women-owned experienced a significant increase from \$12.1 million in 2017 to \$17.2 million in 2018. This represents a 42.9 percent increase from year to year.

With information technology-related requirements comprising most of the awards to minority- and women-owned businesses, the NCUA’s Office of the Chief Information Officer has contributed the most contract dollars to the agency’s supplier diversity efforts. Representing 68.1 percent of all reportable spending at the NCUA, the agency awarded \$44.3 million in total reportable technology contracts. Of this amount, \$21.2 million, or 47.9 percent, was awarded to minority- and women-owned businesses. The NCUA’s Office of the Chief Financial Officer, another sizable contributor to the agency’s supplier diversity performance, awarded 67.5 percent of its \$9.5 million in contracts to minority- and women-owned businesses.

An important change in 2018 was the marked growth in the NCUA’s contracting activity. The NCUA experienced a significant increase in contract award volume where reportable spending increased by 47.4 percentage points, from \$44.1 million in 2017 to \$65.0 million in 2018. The majority of this increase was due to the NCUA’s planned information technology investment in an agency-wide modernization project spanning its systems, processes, and overall cybersecurity profile.

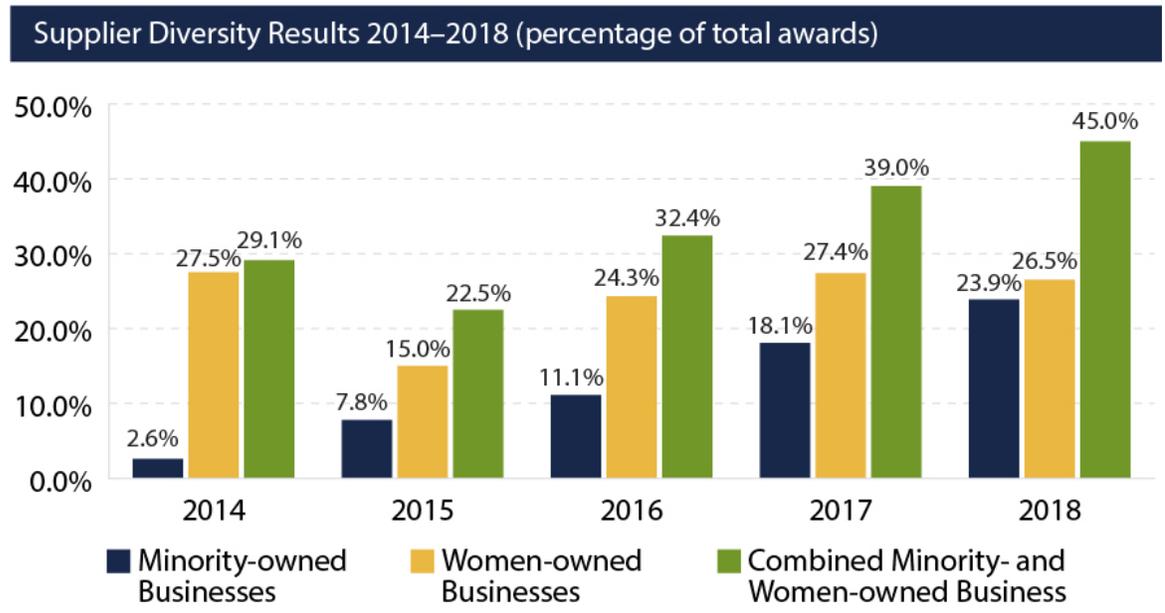
Although the timing of payments to vendors trails contract awards, the NCUA also saw an increase in payments to diverse vendors as a direct result of the marked surge in 2018 contract awards. **Figure 12** shows minority- and women-owned businesses captured 44.4 percent of NCUA contract payments in 2018 versus 39.8 percent during 2017. Amounts paid to all minority-owned firms increased markedly from \$6.7 million to \$10.8 million, whereas payments to all women-owned firms exhibited a 20.2 percent increase, from \$11.9 million to \$14.4 million.

NCUA Vendor Payments Comparison For 2018 Versus 2017				
Contract Payments	2018	Percentage of Total Payments	2017	Percentage of Total Payments
Minority-owned businesses	\$7,541,348	15.3%	\$4,206,277	10.4%
Women-owned businesses	\$11,138,904	22.6%	\$9,429,862	23.3%
Both minority- and women-owned businesses	\$3,220,047	6.5%	\$2,516,904	6.2%
<b>Total contract payments</b>	<b>\$49,350,631</b>		<b>\$40,549,874</b>	
<b>Total payments to minority-owned or women-owned business</b>	<b>\$21,900,299</b>	<b>44.4%</b>	<b>\$16,153,043</b>	<b>39.8%</b>

Figure 12



The reported results for NCUA’s supplier diversity follow a steadily increasing trend in the percentage of contract dollars awarded to minority- and women-owned businesses, as shown in **Figure 13**. The majority of these increases have come from additional contracting with minority-owned businesses, which has grown by 21.2 percentage points over the past seven years. Contracting with women-owned businesses has increased steadily as well, with an increase of 17 percentage points from 9.5 percent in 2012 to 26.5 percent in 2018.



Source: NCUA Supplier Data

Figure 13

## Outreach

During 2018, the NCUA continued its targeted supplier diversity outreach plan to maintain relationships with diverse business partners. Because of its limited contracting budget, the NCUA discovered it is most cost-effective to collaborate with certain key organizations to optimize its outreach efforts.

Extensive vendor outreach efforts in 2018 enabled the NCUA to reach an audience of more than 15,000 participants through agency involvement in the following six outreach events:

- Reservation Economic Summit Annual 2018 Conference (March);
- 28<sup>th</sup> Annual Government Procurement Conference (April);
- US Pan Asian American Chamber of Commerce CelebAsian Conference (May);



- Women’s Business Enterprise National Council National Conference & Business Fair (June);
- National Association of Minority- and Women-owned Law Firms 2018 Annual Meeting (September); and
- National Minority Supplier Development Council Conference and Business Opportunity Exchange (October).

The NCUA also continued its supplier diversity outreach strategy by participating in business panels to further communicate the NCUA’s mission and supply needs. These panels included supplier diversity staff from other federal financial regulatory agencies and reached up to 150 business professionals during the Reservation Economic Summit, the 28<sup>th</sup> Annual Government Procurement Conference, and the CelebrAsian Conference.

## Partnerships

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**OMWI Supplier Diversity Working Group:** Throughout 2018, the NCUA continued to leverage its successful partnership with the interagency OMWI Supplier Diversity Working Group. This group, which is comprised of OMWI supplier diversity analysts from eight federal financial regulatory agencies, is a collaborative, interagency effort to share best practices and maximize access to supplier diversity resources between the agencies.

One of the notable collaborations within the working group was the coordination and execution of the second joint technical assistance event. This was a daylong event in partnership with the Minority Business Development Agency (MBDA) Business Center at the University of Texas at San Antonio. The Offices of Minority and Women Inclusion from the eight principal financial regulatory agencies worked closely with MBDA Center to create an event titled “Smart Contacts – Smart Contracts.” The day’s events included an OMWI panel on supplier diversity, two workshops led by federal contracting experts (federal proposal writing and competitive intelligence), and a local resource panel to connect the day’s lessons with local market resources to support the attendees in their next steps.

The event attracted 199 attendees, who also networked with various local financial and technical assistance providers exhibiting in the venue’s common areas during the course of the day. Ninety-nine percent of those who responded to the post-event survey rated the event as excellent or very good.

Other collaborations included the coordination and staffing for various supplier diversity panels. Group members coordinated with the organizers of three national business events (Reservation Economic Summit, the 28<sup>th</sup> Annual Government Procurement Conference, and the CelebrAsian Conference) to open a panel discussion on how to do business with the agencies represented by the OMWI offices. This new initiative allowed the agencies



to communicate their business needs and the support available to attract and do business with minority- and women-owned suppliers.

**National Association of Minority and Women Owned Law Firms:** The NCUA has leveraged this organization's database of diverse legal talent to include diverse law firms for participation in its legal services contracting opportunities. This relationship has yielded increased diversity spending in the agency's legal services area. In 2018, the Office of General Counsel awarded 30.6 percent of its \$116,344 in contract awards to minority- and women-owned firms.

## **Accomplishments**

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During its seventh year in operation, the NCUA's supplier diversity program has benefited significantly from a high-functioning contracting team within the Office of the Chief Financial Officer (OCFO). During 2018, the NCUA's OCFO released its latest version of the agency's acquisition policy manual, while continuing to lead the sound execution of procurement actions across the agency. OCFO's application of improved contracting practices has ensured minority- and women-owned firms are consistently included in the market research process and invited to participate in the agency's competitive contracting process. OMWI is able to research and identify top minority- and women-owned business talent that aligns with the agency's operational needs. In so doing, OCFO has incorporated the agency's supplier diversity program as an integral part of its continuous improvement process.

Some key practices that leverage this intra-agency office partnership and further the success of the NCUA's supplier diversity program are:

- The NCUA's supplier diversity analyst participates in the Office of the Chief Information Officer's monthly procurement meetings. These meetings connect OMWI to OCIO's current contracting activity and allow for greater awareness of upcoming contracting efforts. With OCIO accounting for 68.1 percent of all reportable contracting activity in 2018 and contributing 73 percent of all minority- and women-owned business contracting in the year, supplier diversity success is highly dependent on this collaborative connection and access to information.
- The January 2018 release of the latest version of the NCUA *Acquisition Policy Manual* continues to require program offices to collaborate with OMWI to identify qualified minority- and women-owned businesses to participate in procurements. Additionally, the agency requires each formal acquisition to have an acquisition plan signed by OMWI, ensuring its involvement with contract actions valued at more than \$100,000.
- OMWI continues to leverage a market research process, which identifies responsive minority- and women-owned businesses interested and qualified to



reply to agency requests for proposals. Attracting interested and qualified minority- and women-owned businesses increases the likelihood of a response to proposal requests.

- Several established practices on the part of the OCFO's Division of Procurement have added to the agency's success in supplier diversity including:
  - Actively directing program offices to collaborate with OMWI during the market research process;
  - Continuing to leverage the use of the National Aeronautics and Space Administration's Solutions for Enterprise-Wide Procurement and GSA contract vehicles to include and invite qualified and competitive minority- and women-owned firms; and
  - Managing the proper use of the Procurement Information System for Management— a commercial-off-the-shelf contract lifecycle management solution, which incorporates supplier diversity program processes and data requirements.

## Technical Assistance

Early in 2018, the NCUA sent a technical assistance and business needs assessment survey to more than 700 minority- and women-owned businesses registered in its vendor registration database. Through this survey, the NCUA identified the highest priorities for technical assistance sought by minority- and women-owned businesses. Based on the survey results, the NCUA tailored two technical assistance webinars to engage minority- and women-owned vendors. The webinars, titled “What You Don’t Know About Codes and Contracts Costs Time and Money,” and “How to Leverage FPDS-NG to Find Federal Contracting Customers and Opportunities,” were each attended by nearly 100 participants looking for ways to navigate and compete successfully in the vast \$500 billion federal contracting market.

## Opportunities and Next Steps

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The coming year presents opportunities for expanding supplier diversity as part of the NCUA's mission support.

### Targeting Large Contracting Opportunities

Since 2012, OMWI has focused its efforts on opening opportunities for minority- and women-owned businesses to participate in the NCUA contracts serviced by the top 25 vendors by contract dollar volume. Since that time, these top 25 vendors have normally captured between 70 and 80 percent of all awarded reportable contract dollars.

At the NCUA, this focused strategy has paid off in building a successful supplier diversity program. In 2018, with increased information technology spending, the NCUA's top-10



and top-25 vendors accounted for \$43.0 million (66.2 percent) and \$54.3 million (83.5 percent) of all reportable 2018 awarded contract dollars. At the same time, five minority- and women-owned businesses in the top 10 received contracts for 48 percent of that group's contract dollar, while the 11 minority- and women-owned businesses within the top 25 vendors captured 46.8 percent of the corresponding contract dollars.

Based on these outcomes, OMWI plans to continue leveraging this strategy for sustained best-in-class results.

## Partnerships and Technical Assistance

The NCUA will continue to collaborate with its OMWI Supplier Diversity Working Group partners to carry out joint technical assistance events and leverage each other's resources. Additionally, the NCUA will continue to coordinate and promote technical assistance offered by existing federally funded programs and other partners.

The NCUA will also continue to collaborate and support the National Association of Minority- and Women-Owned Law Firms as part of its strategy to advance supplier diversity within its legal services contracts.

## Asset Management and Assistance Center

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### AMAC's Mission

The NCUA's Asset Management Assistance Center (AMAC) manages the liquidation of federally insured credit unions. AMAC acts as a liquidating agent and is in charge of liquidating all assets and paying all fees and expenses to administer the liquidation estate.

Due to the nature and purpose of its activities, AMAC has specific policies and procedures to cover procurement and expenses from liquidations. This business activity is recorded within a separate system under different delegations than other agency operations.

### AMAC's Responsibilities

Whenever possible, AMAC considers supplier diversity in executing its mission. AMAC has a responsibility to limit losses to the National Credit Union Share Insurance Fund, which insures the deposits of more than 116 million account holders in federally insured credit unions. Based in Austin, Texas, AMAC operates throughout the United States. Liquidated credit unions may be located in small communities where geography and required services may limit vendor availability. AMAC must act in the hours and days following a liquidation to obtain needed services in support of its mission.



The liquidation process is time-sensitive and requires confidentiality. AMAC must move quickly to preserve assets and limit losses. There may not be sufficient time to identify the type and location of required liquidation-related services in advance of such an action. As a result, AMAC’s operational need to quickly and efficiently preserve credit union assets limits its ability to fully implement supplier diversity during these time-critical situations.

Many of AMAC’s payments to contracted vendors relate to the contractual relationships that pre-date a federally insured credit union’s liquidation. An existing vendor’s performance and contractual relationship with the liquidated credit union is a major consideration in the selection of post-liquidation vendors.

## Contracting Metrics for AMAC

In 2018, AMAC made \$14.2 million in reportable contract payments. Of this amount, \$7.1 million, or 50 percent, were payments to non-discretionary vendors, defined as either securities-litigation or legacy-related payments. The term non-discretionary payment refers to payments to vendors selected by third parties under contracts predating Section 342 of the Dodd-Frank Act and other legacy contracts inherited through the credit union liquidation process. Payments to discretionary vendors selected by AMAC accounted for the remaining 50 percent, or \$7.1 million.

Out of the \$7.1 million in 2018 reportable discretionary vendor payments, 4.0 percent went to minority- and women-owned businesses. This includes payments made to title companies and real estate brokers for conducting real estate transactions. **Figure 14** outlines AMAC’s 2017 and 2018 supplier diversity results.

AMAC Supplier Diversity Payments				
	2018 Dollars	2018 Percent	2017 Dollars	2017 Percent
To minority-owned businesses	\$29,784	0.4%	\$101,539	2.3%
To women-owned businesses	\$276,368	3.9%	\$448,728	10.2%
<b>Total payments*</b>	<b>\$7,119,873</b>		<b>\$4,382,958</b>	
<b>Total to minority-owned or woman-owned businesses</b>	<b>\$288,057</b>	<b>4.0%</b>	<b>\$487,022</b>	<b>11.1%</b>

\* Excludes utilities, taxes, lease-related payments, certain fees to regulated entities related to processing liquidations, payments to employees, owner association fees, and other government entity fees. Totals exclude duplicates for vendors that are both minority- and women-owned.

Figure 14



Between 2017 and 2018, AMAC’s reportable contract payments to vendors increased significantly from \$4.4 million to \$7.1 million (a 62 percent increase) because of a sizable contract for loan servicing related services. This single contract accounted for \$2.9 million of the \$7.1 million in reportable discretionary spend in 2018.

In terms of contract dollars paid to minority- and women-owned businesses, AMAC experienced a significant decrease from \$487,022 in 2017 to \$288,057 in 2018, which represents a reduction of 41 percent. Beyond that, the significant increase in AMAC’s payments to a single, non-diverse contract further depressed the representation of minority- and women-owned businesses in AMAC’s contract payments in terms of percentage.

As in previous years, contract spending on legal services accounted for a notable portion of AMAC’s vendor payments in 2018. During 2018, AMAC’s total discretionary legal services expenditures increased by 15 percent from \$2.0 million in 2017 to \$2.3 million in 2018, and contributed the majority (52.1 percent) of the diverse supplier spend for 2018. During that same period, payments to minority- and women-owned law firms dropped 18.1 percent from \$183,325 in 2017 to \$150,070 in 2018.

As AMAC continues to build relationships with diverse law firms over the course of 2018 and beyond, its overall supplier diversity performance is likely to continue this positive trend. **Figure 15** compares AMAC’s discretionary spending on legal versus other services.

AMAC 2018 Legal Payments				
	Total	Percent of Total	Minority- or Women-owned Business	Percent of Total
Discretionary legal	\$2,325,965	32.7%	\$150,070	52.1%
Discretionary non-legal	\$4,793,908	67.3%	\$137,987	47.9%
<b>Total</b>	<b>\$7,119,873</b>	<b>100.0%</b>	<b>\$288,057</b>	<b>4.0%</b>

Figure 15

## Opportunities and Next Steps for AMAC

AMAC’s overall supplier diversity statistics suffered a reversal during 2018 because of reduced non-legal vendor spending and the impact from one sizable non-diverse contract. Although the original 2016 AMAC Supplier Diversity Action Plan resulted in an increase overall to minority- and women-owned business spending since inception, there is an opportunity to reassess AMAC’s supplier diversity strategies.



The original action plan incorporated three principal strategies to boost supplier diversity engagement and results:

- Annually reviewing the largest vendor relationships, in terms of contract dollar volume, to identify opportunities to apply competition and diversity;
- Actively using its list of identified diverse vendors to participate in its most common legal and non-legal service needs; and
- Leveraging smaller opportunities, especially those worth less than \$50,000, for minority- and women-owned businesses.

These strategies form a sound foundation for increases in both the inclusion and participation of diverse suppliers in AMAC's future contracting opportunities. In 2019, AMAC and OMWI plan to review these strategies and refine the acquisition process to take advantage of all potential opportunities for diverse spending.

Additionally, OMWI will continue to provide AMAC with quarterly supplier diversity statistics and analysis to support effective strategies that reach sustainable success in this area. Together, AMAC and OMWI will review the largest vendor relationships, along with the most common contracted needs, to identify future opportunities for inclusion of diverse suppliers.





## Regulated Entities

### Current State

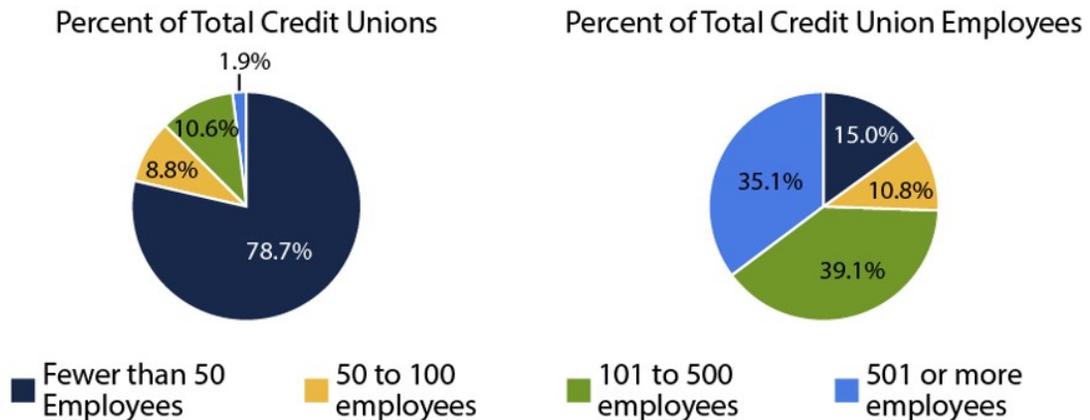
The NCUA’s regulated entities consist of 5,375 federally insured credit unions as of December 31, 2018. These entities include 3,376 federally chartered credit unions and 1,999 state-chartered credit unions that are federally insured. Using December 31, 2018, Call Report data, Figure 16 shows the number of credit unions falling within various total employment levels.

A total of 4,232 credit unions, representing 79 percent of all federally insured credit unions, employ fewer than 50 personnel. Although only 670 credit unions, or 12.5 percent, have 101 or more total employees, they collectively employ 74.2 percent of the 312,771 employees working at all federally insured credit unions.

Federally Insured Credit Union Employee Count				
Employees	2018 Number of Credit Unions	Percent of Total Credit Unions	2018 Number of Employees	Percent of Total Employees
Fewer than 50 employees	4,232	78.7%	47,050	15%
50 to 100 employees	473	8.8%	33,783	10.8%
101 to 500 employees	569	10.6%	122,172	39.1%
501 or more employees	101	1.9%	109,766	35.1%
<b>Total</b>	<b>5,375</b>		<b>312,771</b>	

Figure 16

### Distribution of Employees Among Credit Unions



Source: NCUA Supplier Data

Figure 17



**Figure 18** provides a snapshot of the gender diversity of credit union senior managers at year-end 2018. Overall, a majority of credit union managers and chief executive officers were women. However, women managers and CEOs outnumber men only in credit unions with less than \$100 million in assets. Men make up the majority of managers and CEOs in credit unions with \$100 million or more in assets.

Credit Union Managers And CEOs										
	All Credit Unions		Less than \$100 Million in Assets		\$100-\$500 Million in Assets		\$500 Million-\$1 Billion in Assets		More Than \$1 Billion in Assets	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Gender	52%	48%	63%	37%	28%	72%	16%	84%	13%	87%
Average Net Worth Ratio	14.4	12.7	14.8	14	11.9	11.3	11.5	11.3	11.5	11.1
Average CAMEL Rating	2	1.9	2.1	2.1	1.8	1.9	1.8	1.7	1.5	1.4
Number of Credit Unions	2782	2593	2413	1391	290	736	38	199	41	267

Figure 18

## Assessing Diversity Policies and Practices

The NCUA’s voluntary Credit Union Diversity Self-Assessment assists credit unions in implementing the diversity standards set forth in the [Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies](#).

In 2018, the NCUA redesigned the tool to make it easier for credit unions to use. The new platform now collects optional demographic data when credit unions choose to share it and streamlines the reporting process for enhanced analysis of the results.

Also in 2018, the NCUA issued the first annual Credit Union Diversity Self-Assessment Report of the results of the data collected in 2017. The [full report](#) on the 2017 Credit Union Diversity Self-Assessment can be found on the agency’s public website.

In 2018, 81 credit unions (51 federal and 30 federally insured, state-chartered) submitted self-assessments. This represents a 27 percent increase over the 64 self-assessments submitted in 2017.

The responding credit unions varied in the number of employees and asset size. The aggregate number of employees working at these credit unions represents 5 percent of



employees at all federally insured credit unions. Just over half reported 101 or more employees. Asset sizes ranged from \$399,000 to \$8 billion with 58 of the 81 credit unions, or 72 percent, reporting \$100 million or more in assets. Data on these credit unions, shown in **Figure 19**, is based on Call Report data, as of December 31, 2018.

2018 Self-Assessment Reporting Credit Unions Demographics			
Total Employees	Credit Unions	Asset Range	Aggregate Employees
0-49 Employees	31	\$399,000–\$215 million	522
50-100 Employees	9	\$177 million–\$552 million	722
101-500 Employees	35	\$315 million–\$8 billion	7,572
More than 500 Employees	6	\$2 billion–\$4 billion	4,312
<b>Totals</b>	<b>81</b>		<b>13,128</b>

Figure 19

**Figure 20**, on the following page, is a summary of self-assessment responses from 2016 through 2018 for each of the five standard areas for assessing diversity within regulated entities. Within each area, or set of standards, are several specific, individual standards.

For example, Standard Area 1 contains eight individual standards related to the credit union’s commitment to diversity and inclusion. The self-assessment questions assess whether a credit union implements diversity and inclusion standards such as establishing a written diversity and inclusion policy approved by senior leadership and whether a credit union takes proactive steps to include a diverse pool of candidates when hiring, recruiting, or promoting employees and selecting board member candidates.

Similar to responses in prior years, 57 percent of responding credit unions reported a leadership and organizational commitment to diversity, and 47 percent reported taking steps to implement employment practices to demonstrate that commitment. Thirty percent of reporting credit unions are monitoring and assessing their diversity policy and practices. Supplier diversity and transparency of diversity and inclusion practices remain areas where few of the reporting credit unions have established solid business practices. Detailed summary information with aggregated responses for each standard is located in Appendix VI, starting on page 42.



Average Responses For Each Standard						
Diversity Self-Assessment Standard	Average Affirmative Response			Average Negative Response		
	2018	2017	2016	2018	2017	2016
1. Leadership and organizational commitment to diversity and inclusion	57%	46%	54%	43%	54%	46%
2. Workforce profile and employment practices	47%	54%	53%	53%	46%	47%
3. Procurement and business practices – supplier diversity	5%	7%	7%	95%	93%	93%
4. Transparency of organizational diversity and inclusion	14%	16%	22%	86%	84%	78%
5. Monitoring and self-assessment of diversity policy and practices	30%	24%	22%	70%	76%	78%

Figure 20

Twenty-four credit unions submitted the self-assessment in both 2017 and 2018. The asset range for these credit unions in 2018 was \$10 million to more than \$8.5 billion. Collectively, these credit unions employed approximately 6,000 individuals in total, with a range of between 5 and 945 employees. As indicated in **Figure 21**, these 24 credit unions reported year over year improvement in two of the five broad standards.

Comparison Of Results For Multi-Year Respondents				
Diversity Self-Assessment Standard	Average Affirmative Response		Average Negative Response	
	2018	2017	2018	2017
1. Leadership and organizational commitment to diversity and inclusion	75%	59%	25%	41%
2. Workforce profile and employment practices	62%	69%	38%	31%
3. Procurement and business practices – supplier diversity	9%	10%	91%	90%
4. Transparency of organizational diversity and inclusion	23%	27%	77%	73%
5. Monitoring and self-assessment of diversity policy and practices	52%	36%	48%	64%

Figure 21



## Education and Outreach

**Diversity and Inclusion Summit for Credit Unions:** On September 13, 2018, the Office of Minority and Women Inclusion co-hosted, along with other financial regulatory agencies, the first diversity and inclusion summit for credit unions and other regulated entities. The event gave stakeholders opportunities to learn about leading diversity practices in financial services from financial industry organizations and diversity champions. Participants heard updates on the implementation of the Joint Standards for Assessing Diversity Policies and Practices, and met other financial services colleagues interested in diversity and inclusion.

**Credit Union Guide to Supplier Diversity:** For the past two years, the results of the voluntary Credit Union Diversity Self-Assessment have consistently shown that reporting credit unions do not have successful practices in place to ensure diversity within their business activities. Supplier diversity has scored the lowest among the five standards by a significant margin in both assessments. In response, the NCUA developed and distributed a comprehensive [Credit Union Guide to Supplier Diversity](#). The guide gives credit unions a foundation for supplier diversity efforts and explains how and why to build a supplier diversity program. The guide also demonstrates that the NCUA serves as a diversity and inclusion resource to them. A summary of the guide is available in a [Frequently Asked Questions guide](#).

**African American Credit Union Coalition Annual Conference:** NCUA Board Chairman Mark McWatters addressed an audience of more than 300 at the African-American Credit Union Coalition during their annual meeting in August 2018. He spoke on the state of minority credit unions and noted that the NCUA has resources available through its Office of Credit Union Resources and Expansion to help minority credit unions grow and provide new products and services.

**Inclusiv Annual Conference:** OMWI presented the business case for diversity and inclusion and shared practical applications for implementing diversity and inclusion within credit unions at Inclusiv's annual conference in October 2018.

**Virginia Credit Union League:** OMWI presented the business case for diversity and inclusion and shared practical applications for implementing diversity and inclusion within credit unions at the League's Piedmont Chapter meeting at ValleyStar Credit Union in Martinsville, Virginia, in July 2018.

**Northwest Credit Union Association Conference:** OMWI and a panel of credit union professionals discussed the importance of diversity, inclusion, and representation within credit unions at the association's 2018 annual meeting in October. This breakout session provided the audience a clearer understanding of how their credit unions can take steps toward building and maintaining a diverse and inclusive representation of current and future members.



**Illinois Credit Union Foundation:** In November 2018, the NCUA participated in the “Diversity, Equity, & Inclusion Dialogue” event sponsored by the Illinois Credit Union Foundation. The dialogue was a day-long summit for members of the foundation to learn more about the value of diversity and inclusion and how they can build diversity and inclusion programs within their credit unions. An OMWI representative presented at the event highlighting the Credit Union Diversity Self-Assessment and how the NCUA can serve as a resource for credit unions interested in building their own diversity and inclusion programs.

## Opportunities and Next Steps

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As the regulator responsible for the safety and soundness of the credit union system, the NCUA is committed to modeling and communicating to its regulated entities the importance of diversity and inclusion to credit union sustainability and growth.

In 2019, the NCUA will continue to promote the use of the diversity self-assessment as a useful tool to assist credit unions in developing or enhancing their diversity and inclusion efforts. The agency also plans to publish written guidance to assist credit unions in their efforts to encourage diversity and inclusion in the workplace, at the board and volunteer levels and in the types of products and services they offer their members. The NCUA is also exploring the possibility of convening a meeting of diversity professionals in the credit union industry to discuss strategies and share diversity and inclusion best practices.





## APPENDIX I: NCUA Workforce Diversity Data

NCUA Workforce Diversity Data										
Demographic Group	2018 Total	2018 Percent	2017 Total	2017 Percent	2016 Total	2016 Percent	2015 Total	2015 Percent	2014 Total	2014 Percent
Women	489	43.9%	505	44.3%	530	44.3%	532	43.6%	546	44.2%
Men	624	56.1%	634	55.7%	667	55.7%	688	56.4%	689	55.8%
White	782	70.3%	820	72%	869	72.6%	892	73.1%	910	73.7%
African American	163	14.7%	171	15%	180	15%	180	14.8%	181	14.7%
Asian	71	6.4%	73	6.4%	76	6.3%	74	6.1%	73	5.9%
Hispanic	71	6.4%	58	5.1%	54	4.5%	55	4.5%	53	4.3%
Native American	5	0.5%	8	0.7%	10	0.8%	12	1%	10	0.8%
Multiracial	21	1.9%	9	0.8%	8	0.7%	7	0.6%	8	0.6%
<b>Total employees</b>	<b>1113</b>		<b>1139</b>		<b>1197</b>		<b>1220</b>		<b>1235</b>	
<b>Total minorities</b>	<b>331</b>	<b>29.7%</b>	<b>319</b>	<b>28%</b>	<b>328</b>	<b>27.4%</b>	<b>328</b>	<b>26.9%</b>	<b>325</b>	<b>26.3%</b>



## APPENDIX II: 2018 Federal Employee Viewpoint Survey Inclusion Index Scores

	2018 NCUA Percent Positive	2018 Government- wide Percent Positive
<b>Diversity &amp; Inclusion - The New IQ Index - OVERALL</b>	<b>63</b>	<b>61</b>
<b>Fair</b>	<b>53</b>	<b>48</b>
23. In my work unit, steps are taken to deal with a poor performer who cannot or will not improve.	42	32
24. In my work unit, differences in performance are recognized in a meaningful way.	44	38
25. Awards in my work unit depend on how well employees perform their jobs.	49	46
37. Arbitrary action, personal favoritism, and coercion for partisan political purposes are not tolerated.	58	56
38. Prohibited personnel practices (for example, illegally discriminating for or against any employee/applicant, obstructing person's right to compete for employment, knowingly violating veterans' preference requirement) are not tolerated.	72	70
<b>Open</b>	<b>65</b>	<b>60</b>
32. Creativity and innovation are rewarded.	45	43
34. Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring).	74	58
45. My supervisor is committed to a workforce representative of all segments of society.	74	71
55. Supervisors work well with employees of different backgrounds.	69	69
<b>Cooperative</b>	<b>57</b>	<b>58</b>
58. Managers promote communication among different work units (for example, about projects, goals, needed resources).	54	56
59. Managers support collaboration across work units to accomplish work objectives.	59	60
<b>Supportive</b>	<b>81</b>	<b>78</b>
42. My supervisor supports my need to balance work and other life issues.	80	81
46. My supervisor provides me with constructive suggestions to improve my job performance.	69	66
48. My supervisor listens to what I have to say.	80	79
49. My supervisors treats me with respect.	83	84
50. In the last six months, my supervisor has talked with me about my performance.	91	81
<b>Empowering</b>	<b>60</b>	<b>60</b>
2. I have enough information to do my job well.	69	71
3. I feel encouraged to come up with new and better ways of doing things.	55	61
11. My talents are used well in the workplace.	62	60
30. Employees have a feeling of personal empowerment with respect to work processes.	54	49



## APPENDIX III: 2018 Policy Statement on Diversity and Inclusion

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### Annual Diversity and Inclusion Statement September 2018

The NCUA seeks to reflect the broad diversity of the American population. We value the unique set of talents, skills, experiences, and perspectives each employee contributes toward the NCUA's mission. Further, we strive to maintain an inclusive environment where each person feels respected for who they are and what they contribute.

In addition to bringing value to our workforce and workplaces, we understand that diversity and inclusion contribute to our success in other ways. The NCUA emphasizes diversity in our business activities and seeks out vendors and suppliers who represent America's diversity. We place importance on our efforts to preserve and protect minority-serving institutions as they meet a critical need for many of our most underserved populations. This emphasis also extends to our efforts to assess the diversity policies and practices of all credit unions.

The NCUA's goals, as stated in the [2018-2022 Diversity and Inclusion Strategic Plan](#), help to ensure diversity and inclusion are valued throughout the agency. Each employee, at all levels within the agency, has an active role in implementing the strategies for diversity and inclusion. We hold our management officials at all levels responsible and accountable for practicing inclusive behaviors and upholding diversity and inclusion as core values. As the NCUA Chairman, I affirm this agency's commitment to the diversity of this agency and creating an inclusive culture where our differences are valued.

J. Mark McWatters  
Chairman



## APPENDIX IV: 2018 Policy Statement on Equal Employment Opportunity

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### Annual Equal Employment Opportunity Policy Statement August, 2018

The National Credit Union Administration supports and promotes the principles of Equal Employment Opportunity (EEO) in the workforce, where each employee is treated fairly and with dignity and respect. The agency prohibits discrimination on the basis of race, color, religion, national origin, sex (including sexual harassment, sexual orientation, pregnancy, and gender identity), age (40 years and over), mental and physical disability, genetic information, and retaliation for prior involvement in protected EEO activity. The NCUA also prohibits discrimination based on political affiliation, parental and marital status, military service, or any other non-merit based factor.

These protections apply to all employees, applicants for employment and former employees; and extend to all agency employment programs, management practices and decisions, including recruitment, hiring practices, appraisals, promotions, training, and career development programs.

As a federal agency, the NCUA is responsible for promoting and practicing workplace fairness and maintaining a workplace free of retaliation and harassment. The NCUA prohibits and has a zero tolerance for both sexual and non-sexual harassment. Managers and supervisors must continue to monitor the work environment and ensure it is free of unlawful employment practices. Managers and supervisors are required to take swift action when unlawful practices are identified. In addition to federal laws, the NCUA complies with applicable state and local laws governing nondiscrimination in employment in every location in which we operate.

The NCUA protects the rights and freedom of individuals who exercise their rights under EEO antidiscrimination statutes. Employees who are subjected to unlawful practices must be able to use any of the agency's dispute resolution processes and seek redress in an atmosphere free of retaliation.

All NCUA employees are responsible for implementing the agency's EEO policies and instructions in their daily conduct and activities, and for abiding by the letter, intent, and spirit of the equal opportunity laws and policies.

This statement reaffirms the principles of equal employment opportunity, which enhance the agency's ability to accomplish its mission. I am committed to making the NCUA a workplace of choice where employees are valued, respected, and included.

J. Mark McWatters  
Chairman



## APPENDIX V: NCUA Supplier Diversity Data

NCUA Contract Awards										
	2018 Total	2018 Percent	2017 Total	2017 Percent	2016 Total	2016 Percent	2015 Total	2015 Percent	2014 Total	2014 Percent
Minority- OR women-owned totals	\$29,272,108	45.0%	\$17,198,608	39.0%	\$13,867,702	32.4%	\$7,304,815	22.5%	\$12,440,953	29.1%
Minority-owned	\$12,024,076	18.5%	\$5,129,053	11.6%	\$3,452,466	8.1%	\$2,416,391	7.4%	\$691,871	1.6%
Women-owned	\$13,711,281	21.1%	\$9,198,616	20.9%	\$9,118,238	21.3%	\$4,771,944	14.7%	\$11,336,972	26.5%
Minority- AND women- owned	\$3,536,751	5.4%	\$2,870,940	6.5%	\$1,296,998	3%	\$116,480	0.4%	\$412,110	1%
Asian	\$9,024,737	13.9%	\$5,188,342	11.8%	\$4,384,830	10.2%	\$2,259,626	7%	\$475,164	1.1%
African American	\$5,649,072	8.7%	\$2,572,675	5.8%	\$206,043	0.5%	\$102,395	0.3%	\$414,885	1%
Hispanic	\$289,898	0.5%	\$139,455	0.3%	\$158,592	0.4%	\$170,850	0.5%	\$213,932	0.5%
Native American	\$597,120	0.9%	\$99,520	0.2%	\$0	0%	\$0	0%	\$0	0%
Other minority	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$0	0%
<b>Total awards</b>	<b>\$65,049,098</b>		<b>\$44,114,626</b>		<b>\$42,855,530</b>		<b>\$32,482,888</b>		<b>\$42,721,907</b>	

Note: Minority-owned breakdown by race also includes those that are both minority owned and women-owned.

Source: NCUA

NCUA Vendor Payments										
	2018 Total	2018 Percent	2017 Total	2017 Percent	2016 Total	2016 Percent	2015 Total	2015 Percent	2014 Total	2014 Percent
Minority- OR women-owned totals	\$21,900,299	44.4	\$16,153,043	39.8	\$12,835,800	30.8	\$9,156,066	25.5	\$7,637,746	24.6
Minority-owned	\$7,541,348	15.3	\$4,206,277	10.4	\$1,636,740	3.9	\$2,136,645	5.9	\$619,462	2
Women-owned	\$11,389,904	22.6	\$9,429,862	23.3	\$9,975,393	24	\$6,764,751	18.8	\$6,913,192	22.2
Minority- AND women- owned	\$3,220,047	6.5	\$2,516,904	6.2	\$1,222,667	2.9	\$254,670	0.7	\$105,092	0.3
<b>Total paid</b>	<b>\$49,350,631</b>		<b>\$40,549,874</b>		<b>\$41,633,369</b>		<b>\$35,964,264</b>		<b>\$31,110,291</b>	

Source: NCUA



## APPENDIX VI: 2018 Credit Union Diversity Self-Assessment Results

### Standard 1: Does My Credit Union’s Leadership Make an Organizational Commitment to Diversity and Inclusion?

Credit unions with successful diversity policies and practices generally begin at the top, with leadership that demonstrates its commitment by promoting diversity and inclusion in both employment and contracting, and by fostering an organizational culture that embraces diversity and inclusion. This leadership includes the board of directors, senior officials, and staff managing the daily operations. The following best practices demonstrate an organizational commitment to diversity and inclusion:

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Has a written diversity and inclusion policy approved by senior leadership, including the board of directors and senior management.	48%	52%
2. Has a senior-level official with knowledge of and experience in diversity and inclusion policies and practices to oversee our diversity and inclusion strategies and initiatives.	68%	32%
3. Regularly conducts training and provides educational opportunities on equal employment opportunity and on diversity and inclusion.	68%	32%
4. Takes proactive steps to include a diverse pool of women and minorities or other diverse individual candidates for:		
a. Hiring, recruiting, retention, or promotion of employees.	80%	20%
b. Selection of board member candidates and senior management.	72%	28%
5. Includes diversity and inclusion considerations in our strategic plan for recruiting, hiring, retention, and/or promotion of our workforce.	68%	32%
6. Includes diversity and inclusion considerations in our strategic plan in contracting with vendors.	30%	70%
7. Provides regular (such as quarterly) progress reports on diversity and inclusion efforts to our board of directors or senior management.	20%	80%



## Standard 2: Workforce Profile and Employment Practices

Credit unions that promote the fair inclusion of minorities, women, or other diverse individuals in their workforces proactively work to expand the applicant pool to include diverse candidates, create a culture that values the contribution of all employees, and encourage a focus on these objectives when evaluating the performance of managers. The following best practices help promote diversity and inclusion in the workforce:

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Implements policies and practices to ensure equal employment opportunities for employees and applicants for employment.	74%	26%
2. Implements policies and practices that create or foster diverse applicant pools for employment opportunities. These may include:		
a. Conducting outreach to minority, women, or other diverse individuals. <sup>2</sup>	44%	56%
b. Conducting outreach to educational institutions serving significant or predominately minority, women, or other diverse student populations.	42%	58%
c. Participating in conferences, workshops, and other events that attract minorities, women, or other diverse individuals to inform them of employment and promotion opportunities.	52%	48%
3. Communicates employment opportunities through media reaching diverse populations, including publications or professional organizations and educational institutions predominantly serving minority, women, or other diverse populations.	41%	59%
4. Cultivates relationships with professional organizations or educational institutions that primarily serve minority, women, or other diverse individuals or organizations.	46%	54%
5. Evaluates our diversity and inclusion programs regularly, and identifies areas for future improvement.	49%	51%
6. Uses analytical tools, including quantitative and qualitative data, to assess, measure, and track: <sup>3</sup>		
a. Our workforce diversity at all levels, including supervisory and executive ranks, by race, ethnicity, gender, or other diverse categories.	49%	51%
b. The inclusiveness of our employment practices for hiring, promotion, career development, internships, or retention, by ethnicity, gender, or other diverse category.	44%	56%
7. Holds management accountable for diversity and inclusion efforts, for example by ensuring these efforts align with business strategies or individual performance plans.	30%	70%

<sup>2</sup> “Other diverse individuals or organizations” refer to those identified in your own established diversity and inclusion policies, which could encompass disabled persons, veterans, millennials, or lesbian/gay/bisexual/transgender individuals as examples.

<sup>3</sup> Other examples of analytical tools can be found in [NCUA’s 2014 Office of Minority and Women Inclusion Congressional Report](#).



## Standard 3: Procurement and Business Practices Supplier Diversity

Credit unions can design and implement a supplier diversity policy and practices to expand outreach for contracting opportunities to minority- and women-owned businesses.<sup>4</sup> This involves providing opportunities for diverse businesses to bid on certain contracts or procurement activities (office supplies, promotional items, legal or accounting services) and informing these businesses on how to do business with your credit union. The goal is to develop a competitive advantage by having a broad selection of available and diverse suppliers to choose from with respect to factors such as price, quality, attention to detail, and future relationship building. The following best practices demonstrate a commitment to supplier diversity:

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Has a written supplier diversity policy that provides opportunities for minority- and women-owned businesses to bid to deliver business goods and services to us.	6%	94%
2. Has leadership support to incorporate supplier diversity into business planning cycles or initiatives.	17%	83%
3. Has an established policy to solicit bids from a certain number or percentage of qualified minority- and women-owned businesses.	1%	99%
4. Conducts targeted outreach specifically to inform minority- and women-owned businesses or affinity groups representing these constituencies of contracting opportunities and how to do business with us.	3%	97%
5. Uses metrics to identify a baseline and track:		
a. The total amount we spend annually buying and contracting goods and services.	17%	83%
b. The availability of relevant minority- and women-owned businesses to compete in our	0%	100%
c. The amount we spend with minority- and women-owned businesses.	1%	99%
d. The percentage of contract dollars awarded to minority- and women-owned businesses by race, ethnicity, and gender as compared to total contract dollars awarded for the calendar year.	0%	100%
e. The changes related to the above items over time.	0%	100%
6. Implements practices that promote a diverse supplier pool, which may include:		
a. Participation in conferences, workshops, and other events that attract minority- and women-owned businesses to inform them of our contracting opportunities.	9%	91%
b. Maintaining a listing of qualified minority- and women-owned businesses that may bid on upcoming contracting opportunities.	4%	96%
c. Having an ongoing process to publicize our contracting opportunities.	1%	99%
d. Encouraging prime contractors to use minority- and women-owned subcontractors by incorporating this objective in their business contracts.	3%	97%

<sup>4</sup> See the NCUA Business Activity Diversity section of *NCUA's 2014 OMWI Congressional Report* and prior reports for detailed examples on how to implement supplier diversity policy and practices that aid in expanding contracting and procurement opportunities to minority-owned and women-owned businesses.



## Standard 4: Transparency of Organizational Diversity and Inclusion

Transparency and communication are essential aspects of effective diversity policies and practices. Transparency does not require you to share confidential or proprietary information. Credit unions can communicate information about their diversity and inclusion efforts through normal business methods, such as displaying diversity and inclusion information on websites, in promotional materials, and in annual reports.

By communicating your commitment to diversity and inclusion, your plans for achieving diversity and inclusion, and the metrics to measure success in workplace and supplier diversity, you inform a broad constituency of current and potential members, employees, potential employees, suppliers, and the general community about your affirmative efforts to promote diversity and inclusion. The publication of this information can make new markets accessible for minorities, women, and other diverse groups, and illustrate the progress made toward an important business goal. Below are examples of best practices that promote transparency of your credit union's diversity and inclusion efforts:

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Periodically publishes information about our efforts to enhance diversity and inclusion, which may include:		
a. Demographic information on workforce composition (such as that found on an annual EEOC report.)	37%	63%
b. Demographic information on supplier diversity (contracting activities.)	1%	99%
c. Demographic information on the board members and other officials.	17%	83%
d. Information on sponsorships or partnerships with diverse organizations.	17%	83%
e. Other information on our diversity and inclusion efforts.	9%	91%
2. Makes the following information public:		
a. Our diversity and inclusion strategic plan.	10%	90%
b. Our policy on the credit union's commitment to diversity and inclusion in the workforce.	20%	80%
c. Our policy on the credit union's commitment to diversity and inclusion to supplier diversity.	3%	97%
d. Our efforts and progress toward achieving diversity and inclusion in our workforce and contracting activities.	7%	93%
3. Publicizes opportunities that promote diversity and inclusion, which may include:		
a. Employment and internship opportunities.	38%	62%
b. Contracting opportunities.	3%	97%
c. Mentorship or developmental programs for employees.	20%	80%
d. Developmental programs for potential contractors.	3%	97%



## Standard 5: Monitoring and Self-Assessment of Diversity Policy and Practices

Credit unions with successful diversity policies and practices allocate time and resources to monitor and evaluate performance under their diversity policies and practices on an ongoing basis. The NCUA encourages credit unions to disclose their diversity policies and practices and related information to both NCUA and the public. Below are monitoring and self-assessment best practices:

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Conducts a self-assessment or evaluation of our diversity policies and practices annually.	49%	51%
2. Modifies our diversity policies and practices based on the results of the self-assessment or evaluation of our diversity policies and practices.	40%	60%
3. Provides information pertaining to the self-assessment or evaluation of our diversity policies and practices to the NCUA's OMWI director annually.	22%	78%
4. Publishes information pertaining to our assessment of our diversity policies and practices.	7%	93%